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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY TRENTON DIVISION

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2021 MAR -4 P 12: 11

Plaintiff:

USDC FOR NJ

COMPLAINT

AT 8:30.

Jury Trial: X (Yes)

Samuel B. Katzovicz II

<against>

Defendant:

HIH Logistics Inc., Enelgreen Power Inc.,

I.Parties in this complaint:

Plaintiff:

A. Samuel B. Katzovicz II

50 Andover Dr

Kendall Park NJ 08824

Defendant:

A HIH Logistics Inc.,

17800 Castleton St. #578

City of Industry, CA 91748

Lacey Pang, Rachel Qui

**Enel Green Power** 

100 Brickstone Sqr #300

Andover, MA 01810

Salvatore Bernabei.

II. Basis for Jurisdiction

- A. Diversity of Citizenship
- B. N/A

C. Plaintiff: State of New Jersey

D. Defendant: State of California, State of Texas, State of Massachusetts+Interntional

## III. Statement of Claims:

A. Location: The events took place in Houston TX , State of NJ and State of California, State of Massachusetts

B. Dates: Oct 2020 through Jan 2021

## C.Facts:

Defendant, through its agents, ordered ocean container and freight moving services

from TMX Intermodal TX . All the requested services were performed, subject to standard terms and conditions of service, signed by the defendant.

All the shipments were received by intended consignee, in good order.

TMX Intermodal submitted all required documents, included but not limited to service invoices, to the defendant.

The defendant refused to pay any and all invoices for services rendered in good faith.

Samuel B. Katzovicz bought TMX Intermodal claim against HIH Logistics Inc., Enel Green Power

IV. Injuries: Reputation, employee and financial loss to TMX, predatory demands and irreparable harm to the service provider (Plaintiff)

V. Relief:

Samuel B. Katzovicz is asking for all service invoices (about 75,000\$)+plus all accrued late charges additional services for product recovery and damages of 500,000.00 (five hundred thousands \$) totaling 575,000.00 (five hundreds and seventy five thousands \$)

I declare under penalty of perjury that the foregoing is true and correct

Signed 3 day of March 2021

Signature

Mailing: Samuel B. Katzovicz 50 Andover Dr

Kendall Park NJ 08824

Email: skatzovicz@yahoo.com

I declare under penalties of perjury that true copies of the above were provided to all the defendants in this action

Signed 3 day of March 2021

Signature

Mailing: Samuel B. Katzoviez,

50 Andover Dr

Kendall Park NJ 08824